

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

UNITED STATES OF AMERICA,  
v.  
EDWARD WALSH VAUGHAN (1)  
HADI AKKAD (2)

Case No. 4:22-cr-00162-ALM-BD

**DEFENDANTS' SUPPLEMENTAL PROPOSED JURY INSTRUCTION  
CONCERNING THE DEFINITIONS OF "DEBIT CARD"  
AND "GENERAL-USE PREPAID CARD"**

Defendants, through undersigned counsel, respectfully submit the following proposed jury instruction concerning the definitions of "debit card" and "general-use prepaid card." This instruction supplements the instructions defendants have previously proposed. Docs. 310, 365 (renewed at Doc. 426). We reserve the right to supplement or modify these instructions in light of further developments during trial.

Dated: May 18, 2025.

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify this Motion was electronically filed on May 18, 2025, and all counsel was electronically served via this Court's Electronic Filing System on the day of filing.

/s/ John D. Cline  
John D. Cline

**DEFENDANTS' SUPPLEMENTAL PROPOSED INSTRUCTION  
(Definition of "Debit Card" and "General-Use Prepaid Card")**

The term "debit card" includes any general-use prepaid card. A "general-use prepaid card" means a card that is issued on a prepaid basis in a specified amount, whether or not that amount may be increased or reloaded, in exchange for payment, and that is redeemable upon presentation at multiple, unaffiliated merchants for goods or services.<sup>1</sup>

\_\_\_\_\_ Granted

\_\_\_\_\_ Denied

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<sup>1</sup> "*Debit card* (1) Means any card, or other payment code or device, issued or approved for use through a payment card network to debit an account, regardless of whether authorization is based on signature, personal identification number (PIN), or other means, and regardless of whether the issuer holds the account, and (2) Includes any general-use prepaid card; and (3) Does not include--(i) Any card, or other payment code or device, that is redeemable upon presentation at only a single merchant or an affiliated group of merchants for goods or services; or (ii) A check, draft, or similar paper instrument, or an electronic representation thereof." 12 C.F.R. § 235.2(f)(2) (Federal Reserve regulation implementing the Durbin debit amendment); *see id.* § 235.2(i) (definition of "general-use prepaid card").